

1 BARRY M. KAPLAN, *admitted pro hac vice*  
Email: bkaplan@wsgr.com  
2 GREGORY L. WATTS, State Bar No. 197126  
Email: gwatts@wsgr.com  
3 WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
4 701 Fifth Avenue, Suite 5100  
Seattle, WA 98104  
5 Telephone: (206) 883-2500  
Facsimile: (206) 883-2699

6 JEROME F. BIRN, JR., State Bar No. 128561  
Email: jbirn@wsgr.com  
7 DIANE M. WALTERS, State Bar No. 148136  
Email: dwalters@wsgr.com  
8 WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
9 650 Page Mill Road  
10 Palo Alto, CA 94304-1050  
Telephone: (650) 493-9300  
11 Facsimile: (650) 565-5100

12 Attorneys for Defendants  
SILVER WHEATON CORP.,  
13 RANDY V. J. SMALLWOOD,  
PETER BARNES, and GARY BROWN

14 [Additional counsel on signature page]

15  
16 UNITED STATES DISTRICT COURT  
17 CENTRAL DISTRICT OF CALIFORNIA

18 In re Silver Wheaton Corp. Securities ) Master File No.: 2:15-cv-05146-  
Litigation ) CAS(JEMx)  
19 ) c/w: 2:15-cv-05173-CAS(JEMx)  
20 ) CLASS ACTION  
21 ) **JOINT STIPULATION RE CASE**  
22 ) **SCHEDULE**  
23 ) JUDGE: Hon. Christina A. Snyder  
24 ) Complaint Filed: July 8, 2015  
25 )  
26 )  
27 )  
28 )

1 WHEREAS, on April 17, 2017, the Count entered an order establishing a  
2 pre-trial schedule which, among other things, set the factual discovery cut-off at  
3 March 29, 2018;

4 WHEREAS, Defendants have produced over 1 million pages of documents  
5 responsive to 91 different document requests, the Parties are conferring in an effort  
6 to resolve outstanding document production issues, the Parties are awaiting Judge  
7 McDermott's ruling on Plaintiffs' motion to compel, and Defendants are in the  
8 process of providing privilege logs;

9 WHEREAS, Plaintiffs have taken one complete and five partial depositions,  
10 including current and former employees of Silver Wheaton Corp., Silver Wheaton  
11 (Caymans) Ltd.,<sup>1</sup> Deloitte LLP (Canada) ("Deloitte"), and PricewaterhouseCoopers  
12 LLP (Canada) ("PwC");

13 WHEREAS, on January 12, 2018, Plaintiffs notified Defendants that they  
14 would file a motion seeking leave to amend their Consolidated Amended  
15 Complaint to add claims against Deloitte (the "Motion"), which was filed on  
16 February 5, 2018;

17 WHEREAS, Defendants intend to oppose the Motion, and it has been set for  
18 a hearing on March 26, 2018, three days before the current close of fact discovery;

19 WHEREAS, Plaintiffs intend to take additional depositions and the Parties  
20 agree that these depositions should not proceed while it is uncertain whether  
21 Plaintiffs will obtain leave to name Deloitte as a Defendant and before final  
22 adjudication of the motion to compel;

23 WHEREAS, in light of the foregoing, the Parties agree that good cause  
24 exists to extend the factual discovery cut-off dates and, accordingly, the pre-trial  
25 schedule should be modified; and

26  
27 <sup>1</sup> Effective May 10, 2017, Silver Wheaton Corp. changed its name to  
28 Wheaton Precious Metals Corp., and its Cayman Islands subsidiary changed its  
name to Wheaton Precious Metals International Ltd.

WHEREAS, depending on the Court's resolution of the motion for leave to amend, the schedule may require further modifications;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by Defendants and Plaintiffs, through their undersigned counsel that, pursuant to Local Rule 7.1 and subject to Court approval, the case schedule should be modified as follows, which dates will remain in effect unless the Court grants the Motion:

<b>Event</b>	<b>Previous Date (Dkt. # 146)</b>	<b>Proposed Date</b>
Factual Discovery Cut-Off	March 29, 2018	June 27, 2018
Simultaneous Exchange of Expert Reports Cut-off	May 15, 2018	September 12, 2018
Simultaneous Exchange of Rebuttal Reports Cut-off	June 15, 2018	October 17, 2018
Expert Discovery Cut-off	July 16, 2018	November 30, 2018
Last Day to File Motions	August 16, 2018	January 25, 2019
Pretrial Conference/ Motions in Limine Hearing	February 25, 2019 (11:00 a.m.)	July 15, 2019 (11:00 a.m.)
Jury Trial	March 26, 2019 (9:30 a.m.)	August 20, 2019 (9:30 a.m.)

As stated in the Court's prior pre-trial order, Motions in limine shall be noticed for the date and time of the Pretrial Conference, and filed 28 days prior thereto. Motions in limine/oppositions shall not exceed five (5) pages in length and no replies will be accepted.

1 Dated: February 8, 2018

Respectfully submitted,

2 **WILSON SONSINI GOODRICH & ROSATI**  
Professional Corporation

3  
4 By: /s/ Jerome F. Birn, Jr.  
Jerome F. Birn, Jr.

5  
6 650 Page Mill Road  
Palo Alto, CA 94304-1050  
7 Telephone: (650) 493-9300  
Facsimile: (650) 565-5100  
8 Email: jbirn@wsgr.com

9  
10 **WILSON SONSINI GOODRICH & ROSATI**  
Professional Corporation  
11 BARRY M. KAPLAN  
GREGORY L. WATTS  
12 701 Fifth Avenue Suite 5100  
Seattle, WA 98104-7098  
13 Telephone: (206) 447-0900  
Facsimile: (206) 883-2699  
14 Email: bkaplan@wsgr.com

15 Attorneys for Defendants

16 Dated: February 8, 2018

**THE ROSEN LAW FIRM, P.A.**

17  
18 By: /s/ Laurence M. Rosen  
Laurence M. Rosen

19  
20 The Rosen Law Firm, P.A.  
Laurence M. Rosen, Esq. (SBN 219683)  
355 S. Grand Avenue, Suite 2450  
21 Los Angeles, CA 90071  
Telephone: (213) 785-2610  
22 Facsimile: (213) 226-4684  
Email: lrosen@rosenlegal.com

23  
24 The Rosen Law Firm, P.A.  
Phillip Kim  
275 Madison Avenue, 34th Floor  
25 New York, New York 10016  
Telephone: (212) 686-1060  
26 Facsimile: (212) 202-3827  
Email: pkim@rosenlegal.com

27 Counsel for Plaintiffs and the Class  
28

1                                    ATTESTATION OF CONCURRENCE IN FILING

2            Pursuant to Local Rule 5-4.3.4 of the United States District Court for the  
3 Central District of California, I attest that Counsel for Plaintiffs and the Class and  
4 Counsel for Defendants Silver Wheaton, Randy Smallwood, Peter Barnes, and  
5 Gary Brown have authorized the filing of this document.

6  
7                                    /s/ Jerome F. Birn, Jr.